

SO ORDEREDs/James B. Clark

James B. Clark, U.S.M.J.

Date: 1/13/2025

PAUL S. GROSSWALD, ESQ., LLC
Attorney at Law

98 West End Avenue
 Summit, NJ 07901

777 Westchester Ave., Ste. 101
 White Plains, NY 10604

January 10, 2025

VIA CM/ECF

Hon. James B. Clark
 United States District Court for the District of New Jersey
 50 Walnut Street, Courtroom 2060
 Newark, NJ 07102

Re: Ramirez v. World Mission New Jersey, et al., Docket No. 2:14-cv-01708 (District of New Jersey)

Dear Judge Clark:

I represent Plaintiff Michelle Ramirez in the above-referenced matter. On November 20, 2024, Your Honor ordered that a draft of the parties' final pretrial order shall be due on January 13, 2025, with the telephonic settlement/final pretrial conference to be held on January 23, 2025. [ECF 302.] Then, on December 3, 2024, Judge Semper issued an order denying Defendants' Rule 60(a) motion. [ECF 303.] In that order, Judge Semper stated in a footnote that "Plaintiff may opt to seek leave to file an amended complaint pursuant to the Court's April Opinion and Order." I am still in the process of evaluating whether and to what extent Plaintiff will seek to amend the complaint pursuant to Judge Semper's rulings. I have also engaged in additional settlement discussions with Defendants' counsel in response to Judge Semper's December 3 ruling. Therefore, I believe that the filing of a pretrial order is premature at this time. I am respectfully requesting an adjournment of the dates set forth in the November 20, 2025 order for at least sixty days. All Defendants' counsel have consented to this request. Thank you for your prompt attention to this matter.

Sincerely,

PAUL S. GROSSWALD

cc: Steven L. Procaccini, Esq.
 Steven Vanderlinden, Esq.